

EXHIBIT B

EXHIBIT "A"

REQUEST NO. 1: Documents prepared or obtained by you that in any way reference any public record information associated with the Plaintiff, including without limitation that certain City of Richmond, Virginia, General District Court Civil Judgment entered against Donna K. Soutter in the captioned matter *Virginia Credit Union, Inc. v. Donna K. Soutter*, Case No. GV07-034182 and set aside pursuant to Order entered 3/20/08.

REQUEST NO. 2: All written communications between you and Equifax or any other entity concerning Plaintiff or the collection of judgment information from the City of Richmond General District Court (not including any regularly scheduled communications by which an entries of a judgment is first reported to Equifax for batches of consumers).

REQUEST FOR PRODUCTION NO. 3: Limited to that period beginning on January 1, 2000 and through the present, all contracts, agreements or other communications between you and Equifax regarding the reporting and/or investigations of civil judgment information from the City of Richmond General District Court specifically, and the Virginia court system generally, including, without limitation, all contracts, invoices, e-mail correspondence with, "report cards", "scorecards", marketing materials, policy, procedure, compliance or operating manuals, invoices or other documents concerning your relationships with Equifax, but excluding documents or communications regarding a specific consumer.

REQUEST FOR PRODUCTION NO. 4: In an electronically readable format, all archived reports of judgment data in the City of Richmond General District Court that you have furnished to Equifax during the last five years. [NOTE: PLAINTIFF HAS REQUESTED EQUIFAX'S STIPULATION AS TO NUMEROSITY AND ASCERTAINABILITY. IF EQUIFAX SO STIPULATES, THEN THIS REQUEST WILL BE WITHDRAWN].

REQUEST FOR PRODUCTION NO. 5: Documents that identify the name, most recent address and contact information, job title and job description of each person that you have paid to gather civil judgments in City of Richmond, General District Court at any time during the last ten years.

REQUEST FOR PRODUCTION NO. 6: All emails and other correspondence sent to you by or received by you from any employee of the Virginia judicial system (e.g. any clerk of court, deputy clerk of court or employee at the Supreme Court of Virginia) during the last ten years regarding your collection and/or investigation of civil judgments in the Virginia General District courts

REQUEST FOR PRODUCTION NO. 7: Policy manuals, procedure manuals, or other documents, concerning how you collect information regarding civil judgments in the City of Richmond General District Court and in the other General District courts in Virginia.

REQUEST FOR PRODUCTION NO. 8: Documents containing internal analyses and/or audits of the accuracy of your Virginia civil judgment public records data.

REQUEST FOR PRODUCTION NO. 9: All CDVs you have received from Equifax during the last five years regarding whether or not a civil judgment in a General District court in Virginia had been vacated, appealed or satisfied.

REQUEST FOR PRODUCTION NO. 10: Documents reflecting any statistics you have compiled on an annual basis regarding the number of disputes you received complaining or disputing the accuracy of civil judgment public records data in Virginia on the basis that the judgment was appealed, vacated or satisfied.

REQUEST FOR PRODUCTION NO. 11: Contracts, invoices, agreements, memos, letters, manuals, emails, or any other documents exchanged between you and any third party subcontractor or vendor related to the gathering of public records or other credit data, other than those documents which have been generated through the process of reinvestigating specific consumer disputes or which otherwise relate to a specific and single consumer.

REQUEST FOR PRODUCTION NO. 12: All electronic mail and information about electronic mail (including message contents, header information, metadata, and logs of electronic mail system usage) containing information about your reporting of Virginia civil judgments public records data.

REQUEST FOR PRODUCTION NO. 13: All training materials, contracts, evaluations, meeting notes, performance reviews, or other communications to or from all employees or sub-vendors who have collected any civil judgment information regarding the City of Richmond General District Court for you during the past five years.

REQUEST FOR PRODUCTION NO. 14: For each vendor that furnished City of Richmond General District Court civil judgment public records data to you, please produce all contracts and consideration schedules by which the data was furnished; all records of interactions with the vendor, including, but not limited to, records of meetings, correspondence and other communications in which process improvement, accuracy, timeliness of response, vendor employee training and suggestions for enhancements to vendor production were discussed with regard to the vendor's retrieval of civil judgment information.

REQUEST FOR PRODUCTION NO. 15: Please produce all contracts and consideration schedules by which City of Richmond General District Court civil judgment public records data was furnished by you to Equifax; all records of interactions with Equifax regarding the collection of such data (whether public records civil judgment data generally or specifically just the Richmond data), including, but not limited to, records of meetings, correspondence and other communications in which process improvement, accuracy, timeliness of response, sub-vendor/employee training and/or suggestions for enhancements to production were discussed with regard to your retrieval of civil judgment information.